

SI = 15
JC
9/16/92

MEMORANDUM



Date: September 15, 1992
To: Jeanne Griffin, U.S. Environmental Protection Agency
From: Tom Schaffner, PRC Environmental Management, Inc.
Subject: Contract No. 68-W8-0084
EPA Work Assignment No. 29-5JZZ
Argo-Tech Corporation TRW Inc. OHD 004 179 453
Euclid (Cuyahoga County), Ohio

PRC Environmental Management, Inc. (PRC), was tasked by the U.S. Environmental Protection Agency (EPA) to evaluate the Argo-Tech Corporation TRW Inc. (Argo-Tech) site as a potential candidate for the National Priorities List (NPL) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Superfund Amendments and Reauthorization Act (SARA). PRC has reviewed available file information and discussed pertinent issues with the Ohio Environmental Protection Agency (OEPA), and the site representative. Based on the available information summarized below, PRC recommends that the site be deferred to the Resource Conservation and Recovery Act (RCRA) program for possible corrective action.

The site is an active, multi-faceted, manufacturing complex formerly owned by TRW, Inc. (TRW), and known as the TAPCO facility. The facility is located about 2 miles south of Lake Erie in a mixed industrial and residential area of Euclid, Cuyahoga County, Ohio (Figure 1). Euclid Creek, a perennial tributary of Lake Erie, is located 3/4 miles southwest of the facility (PRC, 1992; OEPA, 1990).

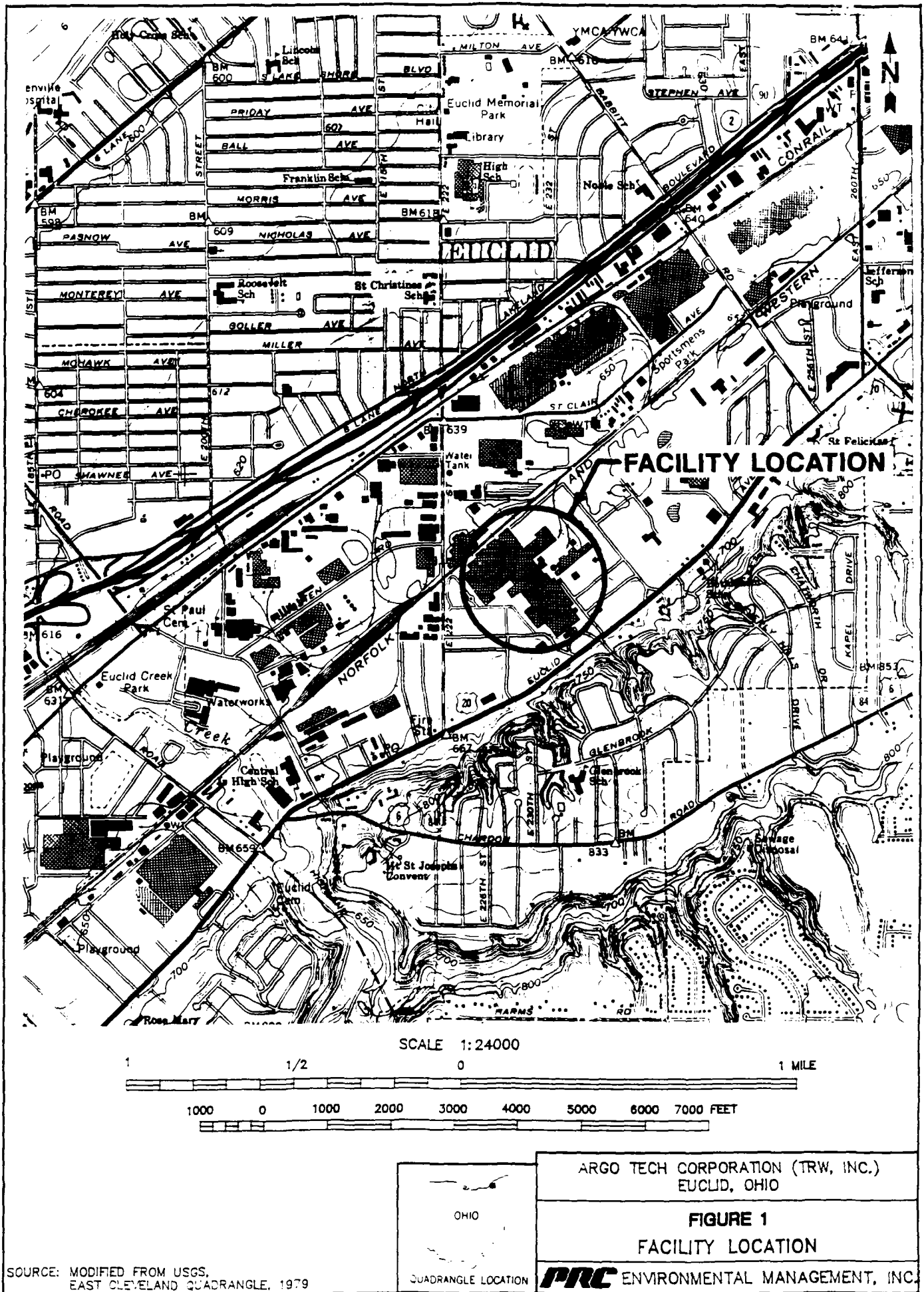
Construction of the TAPCO facility was started in 1941 by the Thompson Aircraft Products Company (TAPCO), which later became TRW. The facility manufactured precision parts for aircraft, naval vessels, and other military and industrial products. For more than 40 years, numerous manufacturing operations took place on the site including forging, heat treatment, machining, metal finishing, and electroplating. Additional activities included aircraft engine and weapons testing (OEPA, 1990).

On October 20, 1986, Argo-Tech purchased the TAPCO property and most of the on-site manufacturing and testing facilities. In addition, Airfoil Forging Textron Corporation (Textron) and Precision Casting Corporation (PCC) each purchased a portion of TRW's operations in August 1986. Argo-Tech leases portions of the facility to International Gear Corporation (IGC), Maine Mechanical Corporation (MMC), and Propulsion Technologies, Inc. (PTI). Currently, six separate companies occupy the facility. Manufacturing operations are similar to those under TRW (PRC, 1992; Argo-Tech, 1991).



Aladi

5/6/98
W. J. ...



The TAPCO facility has a complex regulatory history under RCRA. In November 1980, TRW submitted to OEPA a Part A permit application which identified hazardous wastes as being treated and stored at the facility (PRC, 1992). Under TRW ownership, The facility operated three RCRA solid waste management units (SWMUs):

- Dock 2-B (SWMU 1) was used, beginning in 1980, as a hazardous waste storage area for 55-gallon drums (OEPA, 1990). The SWMU was an 864-square-foot area permitted to store up to 4,400 gallons of waste. Materials stored included 1,1,1-trichloroethane, methylene chloride, tetrachloroethene, and various acids and alkalis (TRW, 1986).
- Building 45 (SWMU 2) stored 1,100 gallons of drummed waste from about 1980 to 1985 (OEPA, 1990). Materials stored included waste acids and cyanide sludges (TRW, 1986).
- Building 49 (SWMU 3) was built in 1965 for torpedo testing activities. The test firings generated wastewater containing liquid fuel residue (otto fuel--a liquid mixture consisting mostly of propylene glycol dinitrate) and cyanides. Until 1985, this wastewater was discharged to a 1,000-gallon underground separator tank (Engineering-Science, 1988). Liquid residues of unburned fuel were separated in the tank and hauled off site for disposal. The remaining wastewater was discharged to a runoff stream northeast of the tank (PRC, 1992).

OEPA granted an interim status permit for these units on May 14, 1982 (PRC, 1992). In December 1984, TRW submitted a letter to the Ohio Hazardous Waste Facility Board requesting that the Part A application be withdrawn. At that time, TRW was converting to generator (less than 90-day storage) status (TRW, 1986).

After selling the facility to Argo-Tech, TRW maintained responsibility for RCRA closure of the SWMUs. When TRW canceled its liability insurance for the facility effective January 1, 1986, OEPA requested a financial test from TRW to ensure that TRW would remain financially responsible for subsequent remediation activities at the site (PRC, 1992; OEPA, 1987). On November 30, 1987, TRW submitted to OEPA notification of withdrawal of its Part A application, and a closure plan for dock 2-B, building 45, and building 49.

In February 1988, OEPA investigated contamination from releases reported in October 1985, July 1987, and November 1987. The first incident, reported on October 31, 1985, involved a release of otto fuel and cyanide from the storage area on the eastern side of building 49 (SWMU 3). Overflow from the separator tank had discharged through an underground pipeline into a swampy area about 100 feet southeast of the building (Engineering Science, 1988; OEPA, 1990). The second incident, reported on July 1, 1987, involved a release of an undocumented quantity of JP-4 aviation fuel from an underground storage tank farm (PRC, 1992). Subsequent investigations, during which soil and ground-water samples were taken, revealed that additional areas around the facility were contaminated with chlorinated solvents, cyanide, metals, petroleum products, and polychlorinated biphenyls (Sitex Corporation, 1987). On November 4, 1987, the facility reported these findings as a third incident of release. OEPA determined that the July 1987 and November 1987 incidents were releases from SWMUs and therefore subject to RCRA corrective action provisions rather than closure requirements (PRC, 1992).

On July 13, 1990, TRW submitted documentation certifying closure of the three SWMUs. OEPA approved TRW's closure and withdrew the Part A permit application on September 17, 1990 (PRC, 1992; OEPA, 1990).

Although TRW has continued its involvement in remedial activities at the facility, details of TRW's involvement and responsibilities along with Argo-Tech are unclear. Each company at

the TAPCO facility has its own U.S. EPA site identification number. None currently store, treat, or transport hazardous waste.

TRW contracted Engineering-Science of Cleveland, Ohio to conduct a remedial investigation (RI) of the TAPCO facility between June 1987 and October 1989. The RI report was completed in July 1990. The investigation focused on 13 areas. Soils in nine of these areas were contaminated with volatile organic compounds (VOCs) and metals. Ground water at the facility was contaminated with VOCs, including chlorinated solvents and petroleum products (Engineering-Science, 1990). However, the horizontal and vertical extent of ground-water and soil contamination, both on- and off-site, has still not been adequately determined.

Although some level of remediation is probably appropriate for this site, NPL listing, via the CERCLA site evaluation program, may not be the most effective way to ensure cleanup. Available documentation indicates that the site was an operating treatment, storage, and disposal facility from 1980 to about 1984. The facility had interim status from 1982 to 1990. There is no indication that the Part A permit was filed protectively, nor has TRW shown unwillingness or inability to finance appropriate corrective action. Because the facility had interim status with documented releases from SWMUs, PRC recommends that the Argo-Tech site be deferred to the RCRA program for review and possible corrective action.

REFERENCES

- Argo-Tech, 1991, Telephone conversation between Bruce Richardson, Environmental Compliance Inspector, and Tom Schaffner, PRC (September 30).
- Engineering-Science, 1988, Building 49 Study Assessment of Soil Contamination and Potential Contaminant Migration (September).
- Engineering-Science, 1990, Remedial Investigation Report for the Former TAPCO Facility Euclid, Ohio (July).
- Ohio Environmental Protection Agency (OEPA), 1987, Letter from David Mentzer, Division of Solid and Hazardous Waste Management, to Maureen A. Brennan, Environmental Counsel, TRW, Inc. (April 23).
- OEPA, 1990, Preliminary Assessment for Argo-Tech, Inc. [sic] (July 18).
- PRC Environmental Management, Inc. (PRC), 1992, Preliminary Assessment/Visual Site Inspection, Argo-Tech Corporation (formerly TRW, Inc.) (February 4).
- Sitex Corporation, 1987, Report of Field Sampling and Laboratory Analyses for Baseline Environmental Study, TAPCO Facility (December).
- TRW, 1986, Draft TRW Inc. TAPCO Facility Closure Plan by Andrew L. Resetar, Environmental Project Manager (August 4).
- U.S. Geological Survey (USGS), 1979, 7.5 Minute Topographical Map, East Cleveland Quadrangle.